

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRAD NORMAN,

Plaintiff,

v.

TRAVELERS INDEMNITY
COMPANY, a foreign insurer doing
business as
"TRAVELERS" in the State of
Washington,

Defendant.

No.: 2:20-cv-1250

**PLAINTIFFS' MOTIONS IN
LIMINE**

**NOTED FOR CONSIDERATION:
OCTOBER 21, 2022**

Plaintiff moves this Court for entry of an Order in Limine precluding any mention, comment, question, argument, or other reference whatsoever by the defendant, or counsel, or through any testifying witness concerning the following matters:

1. No mention of settlement negotiations: parties agree. ER 408
2. To prevent the defendant from referring to the defense medical exam as independent or second opinion, medical exam: The parties agree this may be referred to as a CR35 exam.
3. There should be no mention or colloquy of injury or any lack of injury to others in the collision. ER401, ER 403

Plaintiff Motion in Limine and LCR 7(d)(4) certification
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1 4. There should be no mention of prior injuries to the plaintiff and/or subsequent injuries
2 to the plaintiff and/or medical records concerning the same unless the defendant can
3 connect such injuries to the injuries suffered by the plaintiff in the February 3, 2017 crash
4 by a reasonable probability. ER 401, ER 403

5 5. Motion to exclude testimony for Bradley Probst. (see separately filed motion)

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7 I, David LaCross, hereby certify that pursuant to LCR 7(d)(4) have conferred in good faith
8 with opposing counsel, Karen Bamberger, regarding the Plaintiffs' Motions-in-Limine, and
9 have reached agreement all of the above motions except 3, 4, and 5.

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11 Respectfully Submitted this 3rd day of October 2022.

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15 David LaCross WSBA 31417